

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Shawn C. McGuire,  
Debtor,

Bankruptcy No. 17-14056-mdc  
Chapter 13

HSBC Bank USA, National Association as  
Trustee for ACE Securities Corp. Home  
Equity Loan Trust, Series 2006-CW1, Asset  
Backed Pass-Through Certificates,  
Secured Creditor,

Shawn C. McGuire,  
Debtor / Respondent,

and  
KENNETH E. WEST,  
Trustee / Respondent.

Shawn C. McGuire,  
Plaintiff,

v.

HSBC Bank USA, National Association as  
Trustee for ACE Securities Corp. Home  
Equity Loan Trust, Series 2006-CW1, Asset  
Backed Pass-Through Certificates,

Defendant(s).

Adversary No. 23-00112-mdc

**CERTIFICATION OF REJECTED SERVICE RE: COMPLAINT TO DETERMINE  
VALIDITY OF LIEN**

I, Roger Fay, Esquire, counsel for HSBC Bank USA, National Association as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-CW1, Asset Backed Pass-Through Certificates, do hereby certify that **service of the adversary complaint upon Albertelli Law, Nationstar Mortgage, and HSBC Bank USA, NA is improper**, and in support thereof, avers as follows:

1. Pursuant to the TRANSFER OF CLAIM OTHER THAN FOR SECURITY, filed at Doc. 57 in Case 13-16141-amc, the claim subject to the most recent Adversary Case No. 23-

00112-mdc (Second Mortgage), neither Nationstar Mortgage LLC, nor HSBC Bank USA, N.A., are proper parties.

2. HSBC Bank USA, National Association as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-CW1, Asset Backed Pass-Through Certificates is the secured creditor which holds the First Mortgage, as supported by the amended proof of claim 8-3 filed in bankruptcy case no. 17-14056-mdc.

3. However, HSBC Bank USA, National Association as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-CW1, Asset Backed Pass-Through Certificates no longer holds any interest in the Second Mortgage.

4. Accordingly, neither Roger Fay, Esq., nor Albertelli Law can accept service of the adversary complaint, as it does not represent the transferee.

5. Debtor Shawn McGuire, previously filed bankruptcy case no. 13-16141-amc as well as adversary case no. 14-00068-bif.

6. On April 27, 2015, Court Claim #8 in case 13-16141-amc was transferred to Veripro Solutions Inc. A title search was not included in the adversary complaint to determine if the Second Mortgage has been further assigned.

7. As Albertelli Law does not represent Veripro Solutions Inc., it cannot accept service of the complaint to determine validity of lien and, therefore, rejects same.

ALBERTELLI LAW

DATED: January 26, 2024

By: /s/ Roger Fay, Esq., ID No. 315987  
14000 Commerce Parkway, Suite H  
Mount Laurel, NJ 08054  
(856) 724-1888  
Attorneys for Secured Creditor

B 210A (Form 210A) (12/09)

# UNITED STATES BANKRUPTCY COURT

Eastern District of Pennsylvania

In re Shawn Mcquire,

Case No. 13-16141

## TRANSFER OF CLAIM OTHER THAN FOR SECURITY

A CLAIM HAS BEEN FILED IN THIS CASE or deemed filed under 11 U.S.C. § 1111(a). Transferee hereby gives evidence and notice pursuant to Rule 3001(e)(2), Fed. R. Bankr. P., of the transfer, other than for security, of the claim referenced in this evidence and notice.

Veripro Solutions, Inc.  
Name of Transferee

Nationstar Mortgage, LLC  
Name of Transferor

Name and Address where notices to transferee  
should be sent:  
Veripro Solutions, Inc.  
PO BOX 3572 Coppell, TX 75019

Court Claim # (if known): 8  
Amount of Claim: \$53,266.89  
Date Claim Filed: 11/18/2013

Phone: 469-426-3081  
Last Four Digits of Acct #: 949

Phone: 800-766-7751  
Last Four Digits of Acct. #: 4540

Name and Address where transferee payments  
should be sent (if different from above):  
Veripro Solutions, Inc.  
PO BOX 3244 Coppell, TX 75019

Phone: 469-426-3081  
Last Four Digits of Acct #: 949

I declare under penalty of perjury that the information provided in this notice is true and correct to the best of my knowledge and belief.

By: /s/ Shauntel Walton  
Transferee/Transferee's Agent

Date: 04/27/2015

*Penalty for making a false statement:* Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 & 3571.

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Plaintiff,

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Trustee for ACE Securities Corp. Home  
Equity Loan Trust, Series 2006-CW1, Asset  
Backed Pass-Through Certificates,

Defendant(s).

**CERTIFICATION OF SERVICE**

I, Roger Fay, Esquire, counsel for HSBC Bank USA, National Association as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-CW1, Asset Backed Pass-Through Certificates, hereby certifies that a copy of the Certification of Rejected Service was served upon the following persons via electronic transmission on January 26, 2024, addressed as follows:

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107  
*via electronic transmission and regular mail*

BRAD J. SADEK  
Sadek Law Offices, LLC  
1500 JFK Boulevard, Ste 220  
Philadelphia, PA 19102  
*via electronic transmission and regular mail*

ALBERTELLI LAW  
By: /s/ Roger Fay, Esq., ID No. 315987  
14000 Commerce Parkway, Suite H  
Mount Laurel, NJ 08054  
(856) 724-1888  
Attorneys for Secured Creditor